

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: NORTH SEA BRENT CRUDE OIL FUTURES LITIGATION	Master File No. 13-md-02475-ALC-SN
KEVIN McDONNELL, ANTHONY INSINGA, ROBERT MICHIELS and JOHN DEVIVO, on behalf of themselves and all others similarly situated,  Plaintiffs,  v.  ROYAL DUTCH SHELL PLC, BP PLC, STATOIL ASA, MORGAN STANLEY, TRAFIGURA BEHEER B.V., TRAFIGURA AG, PHIBRO TRADING LLC, VITOL, S.A. and JOHN DOES 1-50,  Defendants.	Case No. 13-cv-07089-ALC-SN  ECF Case
NEIL TAYLOR, on behalf of himself and all others similarly situated,  Plaintiff,  v.  ROYAL DUTCH SHELL PLC, BP PLC, STATOIL ASA, MORGAN STANLEY, TRAFIGURA BEHEER B.V., TRAFIGURA AG, PHIBRO TRADING LLC, VITOL, S.A., and JOHN DOES 1-50,  Defendants.	Case No. 13 Civ. 8179-ALC  ECF Case

**NOTICE OF MOTION OF PLAINTIFFS KEVIN MCDONNELL, ANTHONY  
INSINGA, ROBERT MICHIELS, JOHN DEVIVO AND NEIL TAYLOR  
TO APPOINT KIRBY McINERNEY LLP AS INTERIM LEAD COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion of Plaintiffs Kevin McDonnell, Anthony Insinga, Robert Michiels, John Devivo and Neil Taylor to Appoint Kirby McInerney LLP as Interim Lead Counsel, dated November 20,

2013; the Declaration of David E. Kovel In Support of Motion of Plaintiffs Kevin McDonnell, Anthony Insinga, Robert Michiels, John Devivo and Neil Taylor To Appoint Kirby McInerney LLP as Interim Lead Counsel and attached exhibits, dated November 20, 2013; the *Ex Parte In Camera* Declaration of David E. Kovel In Support of Motion of Plaintiffs Kevin McDonnell, Anthony Insinga, Robert Michiels, John Devivo and Neil Taylor To Appoint Kirby McInerney LLP as Interim Lead Counsel, dated November 20, 2013; all filed in support thereof, oral argument, and other such materials as the Court may consider, Kirby McInerney LLP, on behalf of Plaintiffs Kevin McDonnell, Anthony Insinga, Robert Michiels, John Devivo and Neil Taylor will move this Court before the Honorable Sarah Netburn at the United States Courthouse for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, for an order pursuant to Fed. R. Civ. P. 23(g) appointing Kirby McInerney LLP as Interim Lead Counsel in the above-captioned matter.

Dated: New York, New York  
November 20, 2013

**KIRBY McINERNEY LLP**

/s/ David E. Kovel

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